



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

17 OCT 1989

REPLY TO THE ATTENTION OF:

Mr. Carl J. Bysura  
Director, Installations Planning Division  
Department of the Navy  
Northern Division  
Naval Facilities Engineering Command  
Philadelphia, Pennsylvania 19112-5094

EPA Region 5 Records Ctr.



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Dear Mr. Bysura:

We have reviewed the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the proposed replacement of family housing at the Glenview Naval Air Station (NAS), Cook County, Illinois. The proposed project includes demolition of 106 existing units and construction of 100 new units during Phase I. Demolition of 158 existing units and construction of 160 units would occur during Phase II. The new housing will replace the existing substandard housing units. The new housing will consist of two story townhomes, and each unit will include a garage. Phase I housing will be constructed adjacent to the existing housing to be demolished, and Phase II housing will utilize the demolished housing site.

Our major concerns regard the project's potential impacts on water quality. The housing sites' proximity to existing hazardous waste sites and removal of asbestos from buildings to be demolished are also of concern to our Agency. The project is not expected to have any adverse impacts from aircraft noise since the proposed construction sites are located in an area exposed to a noise level of less than 65 Ldn (Day-Night Level). This exposure level is normally considered compatible with residential land uses.

The EA indicates that the existing housing units to be demolished contain asbestos in the floor tiles, second floor shingles and roofing shingles. Federal Regulations (40CFR Part 61) require that the State and our Agency be notified prior to beginning any work in areas containing asbestos. These same regulations also discuss procedures which must be followed in the removal and disposal of asbestos containing materials. Because demolition will occur in a residential area, additional measures need to be taken to prevent inhalation of asbestos containing materials by nearby residents. The demolition area should be fenced and all asbestos containing materials which have not been removed from the site by the end of each workday should be bagged and kept covered or wetted down in a secure area.

Page 41 of the EA shows the locations of nine potentially hazardous waste sites on the Glenview NAS. Two of these sites are particularly close to the proposed housing sites. Site 1 is a former fire fighting training area, and Site 2 is an area which was used for trash burning between 1937 and 1960.

The EA states that none of the nine sites have been sampled to determine the presence and extent of contamination. A search of our files provides some indication that problems may exist at the NAS. These issues are discussed below. The facility generates spent solvents (trichlorethane and xylene) as well as smaller amounts of other chemicals. The NAS has not been in compliance with the Resource Conservation and Recovery Act (RCRA) during at least two inspections, and the facility has recently been issued a notice of noncompliance dated May 8, 1989. As a part of the settlement of this noncompliance issue, our Agency has previously asked that soil and groundwater sampling be undertaken in the vicinity of Public Works Building #16. Other potential issues include the fact that three drums of PCB contaminated soils were observed being stored on a concrete pad in 1981. The NAS public works officer wrote a letter in 1986 stating that he observed "pollution" east of a ditch near the railroad tracks. The pollution source and constituents were unknown. An inspection in 1986 identified a waste container storage area and a 10,000 gallon waste oil underground storage tank. For these reasons, Glenview NAS should perform an adequate sampling and assessment program to assure that the old solid waste management units will not have any adverse impacts on the health of the construction workers or the residents of the new housing.

The EA indicates that PCB contaminated soils exist southeast of the planned housing project. No information is included in the EA regarding when the contamination occurred, the source of contamination, and current PCB and PCB equipment handling practices. Without such information, we can only comment generally that as a minimum, the area should be cleaned according to the PCB Spill Cleanup Policy stipulated in 40 CFR Parts 761.120, 761.123, 761.125 and 761.130. More stringent cleanup may be required if site specific risk factors warrant such cleanup actions. (Refer to 40 CFR Part 761.120(b)).

If the project includes abandonment of any existing underground storage tanks, then this abandonment must be done in accordance with applicable State regulations and with EPA's regulations on underground storage tanks (40 CFR Parts 280 and 281). During construction or demolition activities, care must be taken to avoid close contact with any vents connected to any underground storage tanks.

The EA discusses measures to be implemented to minimize impacts on water quality during construction. Measures include use of straw bales and filter fabric barriers, diversion structures, sediment basins, mulching, and temporary seeding. The EA also discusses ongoing maintenance of erosion/sedimentation control structures and checking drains and culverts downstream following rainfall events for evidence of blockage by sedimentation. The FONSI states that site grading and construction operations will be designed to minimize erosion and to avoid unnecessary disturbance of adjacent areas. The FONSI should commit to maintaining erosion/sedimentation control structures and inspecting and clearing drains and culverts downstream after rainfalls to minimize sedimentation and flooding impacts.

We appreciate this opportunity to provide comments on this project. If you have any questions regarding these comments, please contact Jerri Horst at (312) 886-4244.

Sincerely yours,

A handwritten signature in black ink that reads "William D. Franz". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

William D. Franz, Chief  
Environmental Review Branch  
Planning and Management Division